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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LaTasha Watson,

Plaintiff

v.

City of Henderson, et al.,

Defendants

Case No.: 2:20-cv-01761-CDS-BNW

**Stipulation and Proposed Order Extending
Deadlines for Replies to Motions for
Summary Judgment and for City of
Henderson to File Answer to First Amended
Complaint**

(Second and Third Request)

Defendants City of Henderson (the “City”), Kevin Abernathy, and plaintiff LaTasha Watson (collectively the “Parties”) stipulate to extend the deadline for the Parties’ to file their replies in support of the motions for summary judgment up to and including May 12, 2023, and for the City to file its answer to the first amended complaint up to and including April 27, 2023. The Parties make the following stipulation for good cause, not for the purpose of delay, and for the following reasons:

1. On November 1, 2021, Watson amended her complaint, asserting nine causes of action against the City, Abernathy, and several previously named individual defendants.

2. During discovery, Watson voluntarily dismissed five of those defendants and another after it had closed.

3. On February 16, 2023, Judge Weksler granted the Parties' stipulation to extend the dispositive motion deadline to February 22, 2023.¹

4. Watson then filed two motions for partial summary judgment: one against the City² and one against Abernathy.³

1. The City and Abernathy both also filed motions for summary judgment.⁴

2. On March 23, 2023, this Court found that resolution of the motions to dismiss was unnecessary given the filing of the cross-motions for summary judgment.⁵

5. After the motions for summary judgment were filed, Judge Weksler granted Abernathy's motion to compel additional deposition testimony from Watson. That deposition took place on March 23, 2023, and the transcript for that deposition became available April 2, 2023.

6. This Court previously granted an extension for the briefing deadlines, setting the responses for April 14, 2023, and the replies for May 5, 2023.

7. All Parties filed their responses to the pending summary judgment motions.

8. Given the number of claims still at issue in this dispute and on which the Parties have moved for summary judgment, and the complex legal issues involved within each, the Parties need additional time to complete their replies to the motions.

9. And because the Parties are currently finalizing briefing related to the summary-judgment motions, the City needs additional time to prepare its answer to Watson's complaint, which requires it to analyze the allegations that survive Watson's voluntary dismissal of various defendants in this matter.

10. The Parties have agreed to the extensions requested.

11. This stipulation is made in good faith and not for the purpose of delay.

¹ ECF No. 155.

² ECF No. 157.

³ ECF No. 158.

⁴ ECF Nos. 162, 164.

⁵ ECF No. 183.

Therefore, the Parties respectfully request an extension for the Parties to file their replies in support of the motions for summary judgment up to and including May 12, 2023, and for the City to file its answer to Watson's first amended complaint up to and including April 27, 2023.

DATED this 20th day of April 2023.

DATED this 20th day of April 2023.

COOK & KELESIS, LTD.

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DATED this 20th day of April 2023.

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ORDER

Good cause appearing, IT IS HEREBY ORDERED that the parties' stipulation is GRANTED.

- Replies supporting the motions for summary judgment [ECF Nos. 157, 158, 162, 164] are due on May 12, 2023.
- The City's answer to Watson's first amended complaint is due on April 27, 2023.

IT IS SO ORDERED.

DATED: April 21, 2023


 UNITED STATES DISTRICT JUDGE

4860-1109-9230